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OFFICE OF THE  
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December 17, 2001

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Mr. David Waddell, Executive Secretary  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243

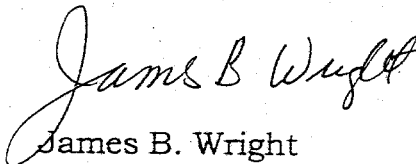
RE: Docket No. 01-00972 (Rulemaking Proceeding -Company to  
Company Complaints)  
Sprint's Comments

Dear Mr. Waddell:

Pursuant to the Notice of Rulemaking issued in this case, enclosed for filing are the original and thirteen copies of the Comments of United Telephone-Southeast, Inc. and Sprint Communications Company L.P.

Please contact me if you have any questions regarding this filing.

Sincerely yours,

  
James B. Wright

Enclosures

CC: Whitney Malone (with enclosure)  
Laura Sykora (with enclosure)  
Kaye Odum (with enclosure)

BEFORE THE  
TENNESSEE REGULATORY AUTHORITY

NASHVILLE, TENNESSEE

In Re: Proposed Rules - Company to Company Complaints  
Docket No. 01-00972

**COMMENTS OF SPRINT COMMUNICATIONS COMPANY L.P. AND  
UNITED TELEPHONE - SOUTHEAST, INC.**

United Telephone-Southeast, Inc. and Sprint Communications Company L.P. (jointly "Sprint") have reviewed the Tennessee Regulatory Authority's ("Authority") proposed rules filed with the Department of State on October 31, 2001. The proposed rules provide for expedited rulings and interim relief between telephone companies with regard to service provisioning. Sprint has the following comments regarding the proposed rules:

1. Section 1220-1-2-.15 (1) of the proposed Rules provides for an expedited ruling in connection with certain types of complaints between telephone companies. Subsection (a) thereof discusses service of the complaint. Sprint recommends that a sentence be added to this subsection (a) to read as follows: "The complainant shall certify on the pleading filed with the Authority that service has been accomplished in compliance with the rule." A similar requirement is set forth in Section 1220-1-2-.15 (2)(b) regarding requests for interim relief.

2. Subsection (c) of Section 1220-1-2-.15 (1) states that a hearing for an expedited ruling shall occur within 30 days from the date the

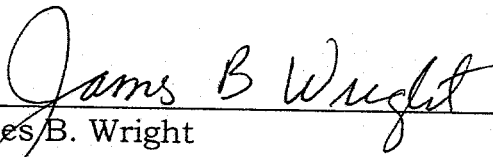
complaint is filed. However, notice of the hearing can be provided with as little as three business days' notice. Sprint recognizes that this is a minimum and the Authority will make every effort to give notice in advance of the minimum. To address those rare occasions where the minimum notice is given, Sprint urges the Authority to amend the rule to specifically allow the parties to participate by phone in the event there are schedule conflicts, transportation difficulties or other work related problems which do not allow a party to be able to make travel arrangements or otherwise be available on short notice. This is particularly helpful for companies with counsel or witnesses located out of state.

3. Subsection (c) of Section 1220-1-2-.15 (2) dealing with requests for interim relief provide for a hearing to be held within seven days of the filing of the complaint. For the reasons stated in the paragraph above, Sprint asks that the rule specifically provide for participation by telephone.

4. Subsection (c) of Section 1220-1-2-.15 (2) also provides for the granting of interim relief. This relief appears to be a form of temporary injunction as authorized by Tennessee Rules of Civil Procedure, Section 65.04 (2) ("TRCP"). Accordingly, Sprint recommends that the standards set forth in the TRCP be included in the Authority's proposed Rule. For example, a new third sentence could be added which states: "Interim relief may be granted if it is clearly shown that complainant's rights are

being or will be violated by respondent, and the complainant will suffer immediate and irreparable injury, loss or damage pending a final decision, or that the acts of the respondent will tend to render such final decision ineffectual." The next sentence in the proposed rule contains some of factors the Authority or Hearing Officer can consider in making the determination whether or not to grant interim relief.

Respectfully submitted,  
UNITED TELEPHONE-SOUTHEAST, INC.  
SPRINT COMMUNICATIONS COMPANY L.P.

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